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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RENÉ QUIÑONEZ and
MOVEMENT INK LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA; and
JEFF AGSTER, EVA CHAN, STEPHEN
FAJARDO, MARK HODGES, ROBIN LEE,
and DOES 1 through 2, United States Postal
Service and United States Postal Inspection
Service officials in their individual capacities,

Defendants.

Case No. 3:22-cv-3195-WHO

**STIPULATED REQUEST
TO RESET HEARING DATE OF
PENDING MOTIONS TO DISMISS
[ECF 64, 65]**

Judge: Hon. William H. Orrick

Plaintiffs, Defendant United States, and the appearing individual Defendants respectfully stipulate to and request under Local Rule 6-2 that the Court reset the hearing date for Defendants' pending motions to dismiss Plaintiffs' Second Amended Complaint, from July 12 to June 21. This is the first request for a modification of time regarding the pending motions.

Defendants initially planned to notice the motions hearing for June 21, but Plaintiffs

requested that they notice it for June 28 because of a scheduling conflict. On May 17, Defendants did so. On May 18, the Court reset the date from June 28 to July 12. But Plaintiffs' counsel will be out of the country for a previously planned vacation on July 12. And Plaintiffs' counsel's conflict with June 21 has since been resolved. Accordingly, Plaintiffs and Defendants respectfully stipulate to and request that the hearing be reset to June 21.

We note that, accounting for the parties' and the Court's availability, if June 21 is no longer available, it appears the next opportunity for the hearing will not be until October 11. This is based on the Court's posted availability, Plaintiffs' counsel's July travel, and Defendants' counsel's July to October parental leave.

This stipulated request is supported by the accompanying declaration by Plaintiffs' counsel.

Dated: May 19, 2023

s/ Jaba Tsitsuashvili
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 22, 2023


Hon. William H. Orrick
United States District Court Judge